

I. GENERAL DESCRIPTION OF OPERATIONS

The Chicago International Exporting (CIE) site is located at 4004-4020 S. Wentworth Avenue, and 4000-4027 S. Wells Street, Chicago, Cook County, Illinois. The facility is an active scrap yard that reclaims copper, aluminum and steel from electric motors and other large pieces of machinery. Copper, aluminum and steel are sold to recyclers who further recycle it for use in new equipment. The plant site is approximately 2.5 acres in size located west of Dan Ryan Expressway, south of the Burlington Northern Railroad tracks and lying between Wentworth Avenue and Wells Street. This operating plan provides a brief description of the general operations at CIE and a process flow diagram; identifies the sources of hazardous material contamination and further describes the operating procedures being implemented to control any escaping of the hazardous material into the environment.

A. Process Flow Diagram

A process flow diagram of CIE is attached as Figure 1 of this document. In general, there are approximately 15 types of materials that are brought into the site. Of the 15 types of materials, approximately 9 types of material constitute the major portion of the incoming stream. They are:

1. Sealed units (compressors A/C),
2. Industrial compressors pumps,
3. Starters and generators,
4. Small motors,
5. Mix motors,
6. Large motors,
7. Shredder pickings from other scrap yards,
8. Large DC motors, and
9. Aluminum motors.

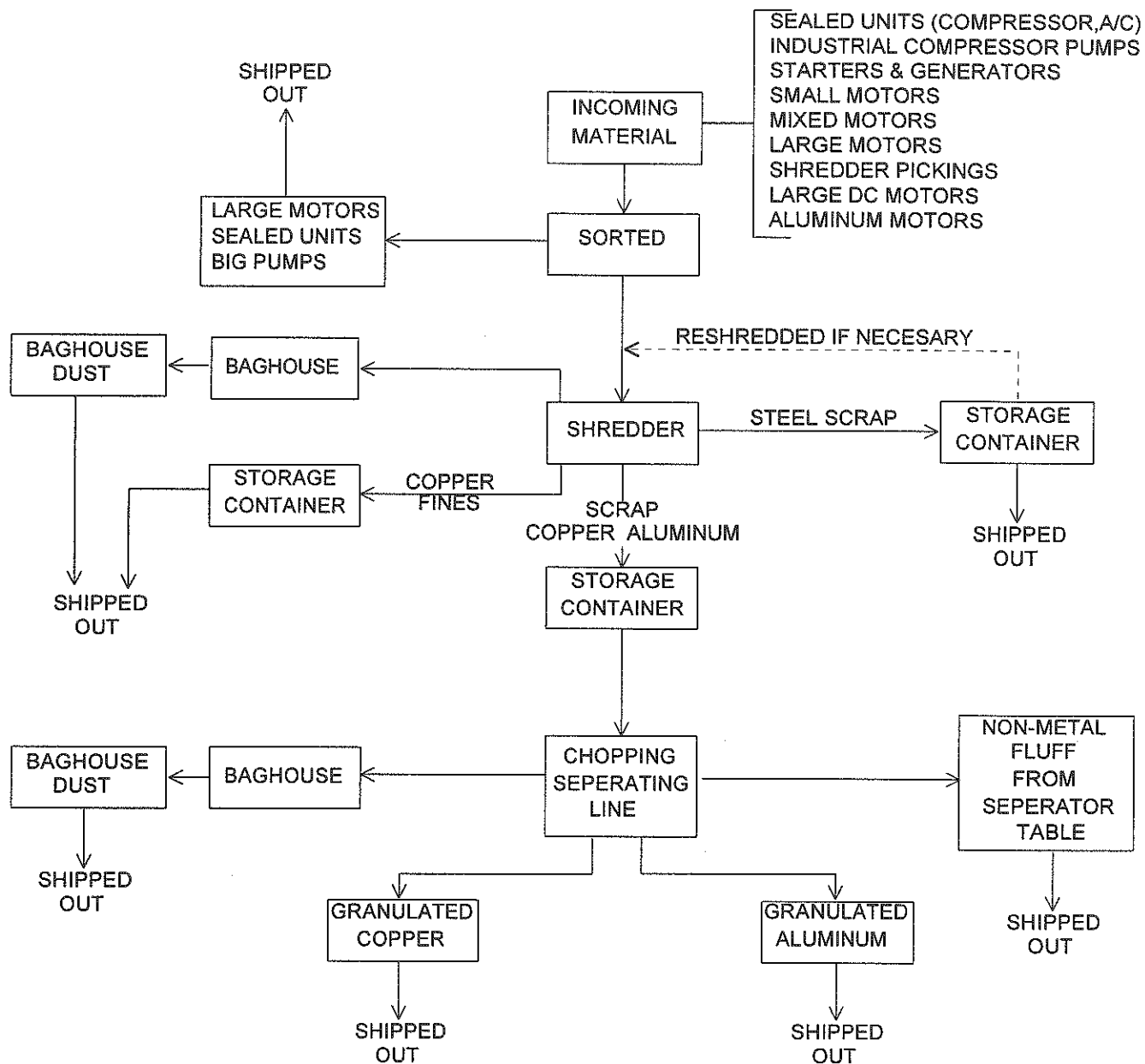



FIGURE 1

 International Engineers, Inc.	
PROCESS FLOW DIAGRAM	
CHICAGO INTERNATIONAL EXPORTING 4020 S. WENTWORTH AVE. CHICAGO, ILLINOIS	
6-29-95	Drawing Not To Scale

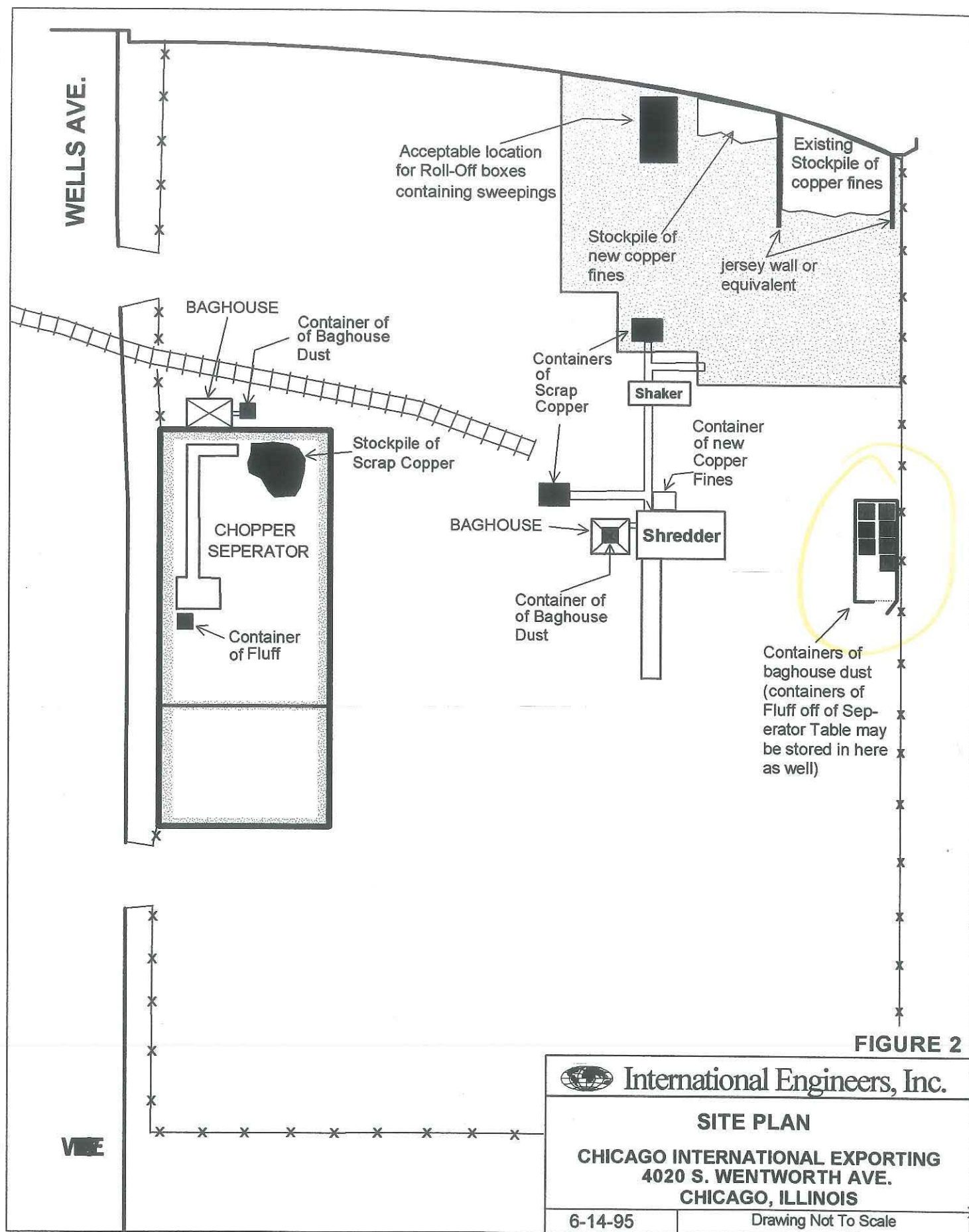
The material is brought into the site via either truck or railcars. The material is off-loaded either near the front door entrance located on Wells Street (Point a) or either side of the railcar. As each material is brought into the site, it is weighed and sorted. Large motors, sealed units and big pumps are segregated and are shipped in as is condition to other sources as a recyclable product. The rest of the material is segregated into various types of materials (i.e., large motors, small motors, shredder pickings, etc.) and stored in the dedicated portion of the site. These materials are processed through the shredders for the recovery of copper and steel.

As the shredder is operated, the various material previously stored from incoming materials are picked up by an overhead crane or by a front end loader and dropped into a hopper on top of the conveyor leading into the shredder. Shredding consists of a hammer-like mechanism which continuously tears the motors apart into smaller pieces. Fine particulate matter is captured by a baghouse and the rest of the material drops into a conveyor belt which is perforated with small holes. This belt transports the processed material further into magnetic segregation units. A large metal rotary wheel takes the steel and drops into the conveyor belt that holds the steel scraps. The copper and aluminum is dropped into a separate conveyor belt that takes it to another container. Finally, shredded material, called copper fines, falls through the perforations of the conveyor belts. These copper fines are collected and stored on site for resale. The steel and copper scrap is sometimes re-ran through the shredder to break into smaller pieces. The copper and aluminum scrap is transported to the chopping/ separating lines which is located inside the main building. The chopping/ separating line breaks the scrap copper/aluminum into smaller pieces and segregates into either copper or aluminum. The end product is stored in 55 gallon containers which are subsequently shipped out to reprocessors. The chopping/ separating line is also controlled by a separate

baghouse. This baghouse is equipped with a screw conveyor which empties the baghouse dust into a Gaylord box.

B. Site Map

A generalized site map of CIE is shown in attached Figure 2 showing various locations and the operations of the site.



II. MATERIAL HANDLING PROCEDURES

In response to the environmental cleanup performed by the U.S. EPA in 1994-1995, the following "housekeeping" procedures were developed to prevent re-contamination of the site and to ensure compliance with EPA's waste management regulations.

In addition, a number of OSHA standards will also apply due to the presence of PCBs and lead in many of the onsite materials. At a minimum, OSHA's Personal Protective Equipment Standard (29 CFR 1910.132) will apply to all employees exposed to these materials and will include such requirements as the use of impermeable gloves whenever materials are handled and mandatory cleansing of hands before each break and at the end of each day. Other OSHA standards may apply depending on the employee's activity and particular material being handled, as further discussed below.

A. Incoming Materials

1. Prior to acceptance of each load of material, the load shall be visually inspected for the presence of PCB-containing articles or an excessive quantity of dirt and fluff. If PCB-containing articles or an excessive quantity of dirt and fluff are observed, the load shall not be accepted. All acceptable loads shall be unloaded and stockpiled on pavement only.

B. Materials Coming Off Shredder Line

1. Baghouse Dust: Baghouse dust shall be transferred to a Gaylord box through a fully enclosed chute and at a slow enough rate that will prevent dust dispersion into the air. If feasible, a fully enclosed screw/auger transfer mechanism should be installed to facilitate the transfer in a more controlled manner. During wet weather conditions, polyethylene shall be placed over the Gaylord boxes

while they are outside.

Due to the potential to inhale dust containing lead and PCBs, OSHA's respiratory protection and lead standards (29 CFR 1910.134 and 29 CFR 1910.1025) may apply. Appendix B contains more information on the potential for over-exposure to the materials.

The filled Gaylord boxes shall be weighed, labeled (see Section VII.A) and stored on a pallet in a fully enclosed and secured steel freight container until shipped offsite for disposal. Figure 2 shows the location of the freight container.

2. Copper Fines: To prevent dust dispersion and runoff from the copper fines, a container providing full capture of the copper fines shall be placed under the area where copper fines fall off the shredding line. Containerized copper fines shall then be transferred to the Area shown on Figure 2, where they may be stockpiled or retained in containers. Ongoing sampling shall be conducted over a quarterly basis for a year.

To prevent offsite spillover of the stockpiled copper fines, the area used for storage of the copper fines may be bounded by the railroad retaining wall on the north and two additional walls extending directly out from the railroad retaining wall. The two additional walls should consist of jersey-wall barriers placed end-to-end or an equivalent type construction.

Stockpiled or containerized material shall not extend beyond the limits of the bounded area. Each evening, the stockpiled or

containerized material shall be covered with a durable and impermeable tarp. Or, as a permanent alternative, a 3-sided shelter with roof may be built over the area, such as those used for salt bins for the storage of road salt (pole and corrugated metal construction.)

3. Scrap Copper: All scrap copper shall at all times be conveyed directly into containers. If left outside, containers with the scrap copper shall be covered each evening with a tarp to prevent rainwater/snowmelt runoff from them. If a larger volume must be accumulated in a stockpile, it must be covered each evening with a tarp or placed into a sheltered area where rainwater/snowmelt will not runoff from the stockpile and wind will not disperse dust and particulates.
4. Spillover: Shredded materials that fall off of conveyor belt or the chute under the shredder shall be cleaned up each day and re-ran through the shredder or placed with the scrap copper, scrap steel or copper fines as appropriate. Cleanup shall include all dust, dirt and fluff that accumulates on the pavement around the shredder.

C. Chopper/Separator Line Materials

1. Baghouse Dust: Baghouse dust shall be transferred to a Gaylord box through a fully enclosed chute and at a slow enough rate that will prevent dust dispersion into the air. If feasible, a fully enclosed screw/auger transfer mechanism may be installed to facilitate the transfer in a more controlled manner. During wet weather conditions, polyethylene shall be placed around the Gaylord boxes while they are outside.

Due to the potential to inhale dust containing lead and PCBs, OSHA's respiratory protection and lead standards (29 CFR 1910.134 and 29 CFR 1910.1025) may apply. Appendix B contains more information on the potential for over-exposure to the materials.

The filled Gaylord boxes shall be weighed, labeled (see Section VII.A) and stored on a pallet in a fully enclosed steel freight container until shipped offsite for disposal. Figure 2 shows the location of the freight container.

2. Spillover: Materials that drop out of the conveyor system and onto the floor or equipment covers shall be collected at least once per week and returned to the scrap copper/aluminum stockpile to be re-run through the chopping/separating line. Cleanup shall include all dust, dirt and fluff on the floor and machinery.
3. Non-Metallic Fluff Off of Separating Table: This material shall be directly discharged into sturdy containers in a manner that will not disperse dust to the ambient air. The container into which the fluff is discharged must be transferred to a designated storage area within three days after more than 55 gallons of waste has accumulated in the container. The container must be labeled with the words HAZARDOUS WASTE and the date when more than 55 gallons of waste began accumulating and must be closed at all times except when adding or removing fluff. A PCBs label (see Appendix A) must also be placed on the container.

The designated storage area may be the same freight container used for the containers of baghouse dust or it may be another container located elsewhere onsite (either bulk or another steel freight container). In either case, the storage area must be labeled with the words HAZARDOUS WASTE, must have a PCBs label (see Appendix A) and shall be marked with the date upon which a container of air table fluff is first placed into the storage area after each time the storage area is emptied of containers of air table fluff. The storage area must be closed at all times except when adding or removing fluff.

III. MAINTENANCE PROCEDURES

In response to the environmental cleanup performed by the U.S. EPA in 1994-1995, the following "housekeeping" procedures were developed to prevent re-contamination of the site and to ensure compliance with EPA's waste management regulations.

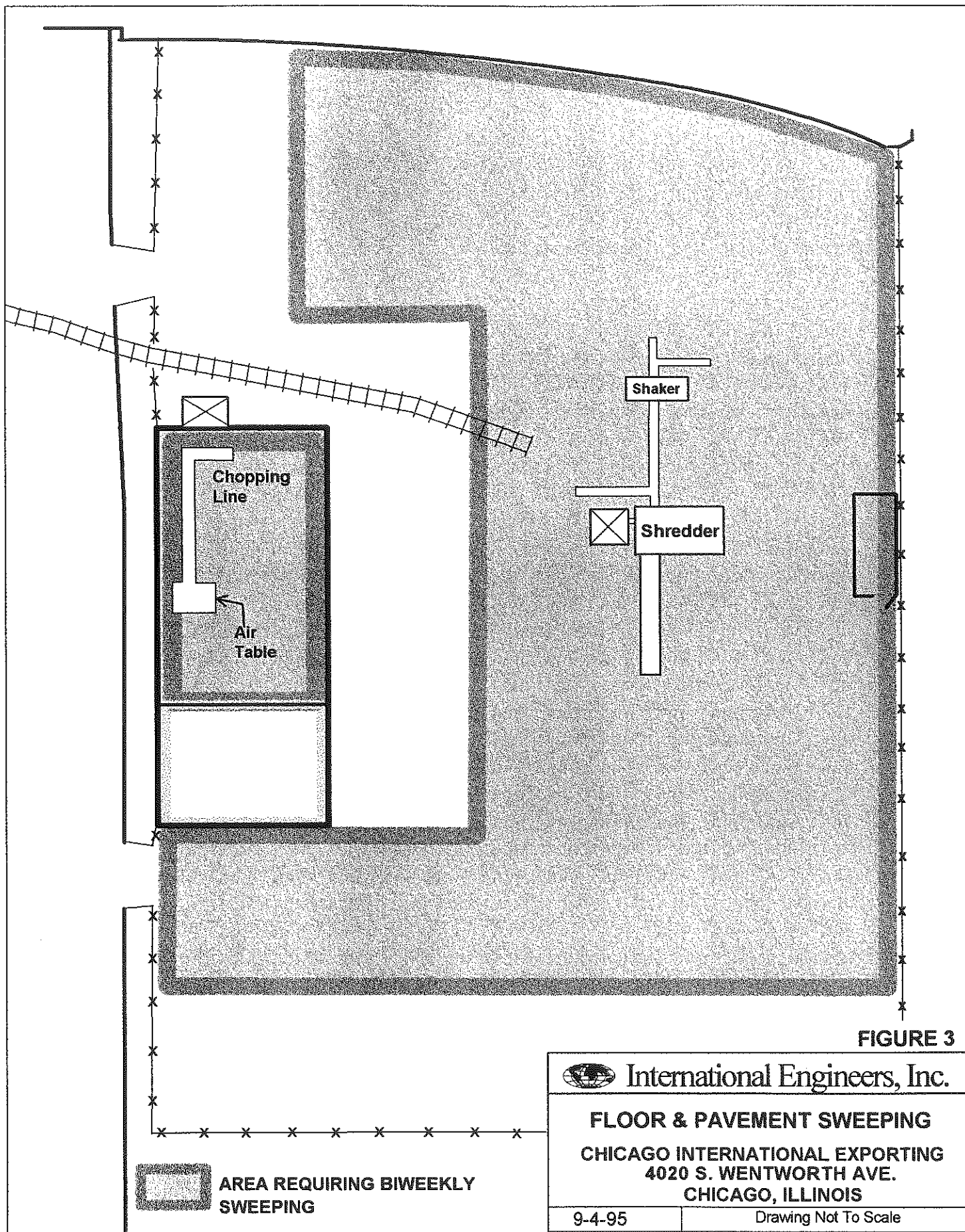
A. Baghouse Maintenance and Inspection

Both baghouses shall be maintained in accordance with the manufacturers recommendations. For any work inside the baghouse, including filter repair or replacement, appropriate personal protective equipment and a respirator shall be worn (OSHA Standards 29 CFR Parts 1910.132, 1910.134 and 29 CFR 1910.1025 will apply). In addition, the inside area of the baghouse shall be considered a confined space (OSHA Standards 29 CFR Part 1910.146 will apply) and shall be assumed to have a hazardous atmosphere until demonstrated otherwise by showing that the atmosphere is not oxygen deficient each time the baghouse is entered.

B. Grounds Maintenance and Inspection:

1. Floor and Pavement Sweeping: All dust, dirt and debris on paved and floor surfaces, not including any materials that can be re-run through the lines, must be swept and picked-up on a bi-weekly basis using the vacuum sweeper and a stiff broom as appropriate. The collected dust, dirt and debris must then be temporarily stored in a roll-off box (or an equivalent container with a cover) until proper disposal. The areas requiring weekly sweeping and pickup are approximately shown on Figure 3.

Is this RCAA H2?



If the vacuum or broom sweeping or transferring to the roll-off box creates dusty conditions, affected personnel shall wear appropriate personal protective equipment (OSHA Standards 29 CFR 1910.132, 1910.134 and 1910.1025 may apply).

Dust, dirt and debris from the sweeping shall be transferred to a roll-off box and covered with a tarp. After each roll-off box is filled, the material must be tested and then possibly disposed as further described in Section VII.

2. Sump pits: Sump pits used to capture runoff from paved areas shall be kept free and clear of obstructions. Accumulated sediment in the sump pits shall be removed as necessary to maintain proper function of the sump pit. The removed sediment shall be stored in the same container as the floor and pavement sweepings since it would consist of dust, dirt and debris from the paved surfaces.
3. Inspection of Storage Areas: All containers of baghouse dust and fluff off of the separator table shall be checked for leaks and deterioration at least once every 30 days. The roll-off boxes containing sweepings shall be checked for leaks every 30 days as well.

C. Equipment Maintenance and Repair

1. Equipment maintenance and repair that results in dispersion of dust into the air around one or more workers or results in excessive transfer of dirt to the worker's clothing or skin shall be performed with the appropriate personal protective equipment, clothing and

respirator (OSHA Standard 29 CFR Parts 1910.132, 1910.134 and 29 CFR 1910.1025 may apply). In addition, the inside of the shredder shall be considered a confined space (OSHA Standard 29 CFR 1910.146 will apply) and shall be assumed to have a hazardous atmosphere until demonstrated otherwise by showing the atmosphere is not oxygen deficient.

IV. SPILL AND RELEASE PROCEDURES

A. GENERAL

One purpose of this plan is to assure prompt response to the accidental release of a hazardous material.

The elements of a prompt response are as follows:

- 1) REPORT the spill event, if required, to city, state and federal agencies.
- 2) ACT promptly to CONTAIN the spill.
- 3) ACT promptly to CLEAN UP the spill.
- 4) COOPERATE with regulatory authorities in any way they suggest to prevent or control a spill.

B. RESPONSIBILITIES

The responsibility for spill control shall be vested in the Site Manager. He shall carry out all aspects of the spill prevention and control program, including personnel training, maintenance of spill equipment and supplies, development of procedures, inspections, and on site direction of operations. The Site Manager is Steven Cohen.

C. COMMUNICATIONS

The effectiveness of any action plan is dependent upon employee awareness of the communication system developed for this purpose.